

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)  
(Jointly Administered)

**Hearing Date: 2/26/2025 at 10:30 a.m. (ET)**

**Re: Docket Nos. 1962, 1791, and 2013**

**JOINDER TO PRESTIGE PATIO’S OPPOSITION TO DEBTOR’S MOTION FOR  
ENTRY OF AN ORDER (I) SETTING A BAR DATE FOR FILING PROOFS OF  
CLAIMS FOR PRE-CLOSING ADMINISTRATIVE EXPENSE CLAIMS AGAINST  
THE DEBTORS, (II) ESTABLISHING PRE-CLOSING ADMINISTRATIVE  
EXPENSE CLAIMS PROCEDURES, AND (III) GRANTING RELATED RELIEF,  
INCLUDING NOTICE AND FILING PROCEDURES**

Hybrid Promotions, LLC d/b/a Hybrid Apparel Air Waves, LLC, the holder of an unpaid post-petition, administrative expense claim hereby joins the Opposition to Debtor’s Motion for Entry of an Order (I) Setting a Bar Date for filing Proofs of Claims for Pre-Closing Administrative Expense Claims against the Debtors, (II) Establishing Pre-Closing Administrative Expense Claims Procedures, and (III) Granting Related Relief, Including Notice and Filing Procedures (the “Motion”) filed by creditor Prestige Patio Co., Ltd. [Docket No. 2013]. In particular, the Motion and the proposed procedures inappropriately seek to permit payment to creditors effectively at the Debtor’s discretion. All administrative expense claims should instead be paid pro rata (taking into consideration any amounts they have already received).

Respectfully submitted,

THE WILLIAMS LAW FIRM, P.A.

Dated: February 20, 2025

By: /s/ John L. Williams

John Legaré Williams (Del. Bar. #4473)

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases is available on the website of the Debtors’ claims and noticing agent, <https://cases.ra.kroll.com/biglots/>.

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